

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

NYGEA WILLIAMS

CIVIL CASE NO: 1:16-CV-731
(to be supplied by Clerk
of the District Court)

(Enter above the full name of
plaintiff in this action)

C. Conner Schuch

v.

OFFICE OF VOCATIONAL REHABILITATION
DAVID DE NOTARIS DIRECTOR
SECRETARY U.S. DEPT OF EDUCATION

FILED
HARRISBURG, PA

MAY 02 2016

ADA

(Enter above the full name of
the defendant(s) in this action)

ALLYSON WILL BRAUNT
JOSEPH SCHUCKEY @
FOR ANTHONY MILER

COMPLAINT

1. The plaintiff NYGEA WILLIAMS a citizen of
the County of DAUPHIN State of
Pennsylvania, residing at 1326 HOWARD ST. HARRISBURG, PA 17104
wishes to file a complaint under RANDOLPH SHEPARD ACT.

(give Title No. etc.)

20 U.S.C. 10701 et seq / ADA / 42 U.S.C. 1983 -
TITLE 34 EDUCATION

2. The defendant is OFFICE OF VOCATIONAL REHABILITATION, SECRETARY
U.S. DEPT OF EDUCATION / DEY KIEGER / NAN BONNET FOLK / AGENTS
ALLYSON WILL BRAUNT, IDA REP COORDINATOR

3. STATEMENT OF CLAIM: (State below the facts of your case. If you have paper
exhibits that give further information of your case, attach them to this completed form. Use as
much space as you need. Attach extra sheet(s) if necessary)

PLAINTIFF IS A BLIND VENDOR PROTECTED UNDER THE
20 USC 10701 et seq + ADA, SECTION 504 OF THE REHABILITATION ACT OF 1973
AND PLAINTIFF IS AN AFRICAN AMERICAN FEMALE.

DEFENDANT HAVE NOT YET BEEN NOTIFIED BECAUSE OF AGENCY OF RECORD

3. (CONTINUED)

PLAINTIFF HAS BEEN IN THE BEP-BUSINESS ENTERPRISE PROGRAM FOR 10 MONTHS & RAN INTO STAFF AND APT. ON ~~THURSDAY~~ ^{THURSDAY} APRIL 28 2016. ~~THE~~ A BEP KENNY NAME JOEY KLOGER CAME ONTO THE PLAINTIFFS PLACE OF BUSINESS WITH HER 2 CHILDREN, WHO WERE AND RUNNING & AND DOING BACKLIPS OVER THE PREMISES, RUNNING BACK & FORTH IN THE KITCHEN WITH A HAIL NET AND CREATING A RUCKUS WHEN PLAINTIFF TOLD THE AGENT THE CUSTOMER WERE COMPLAINING. ~~THEY~~ ^{THEY} CREATED AN INCIDENT WITH ONE OF THE WORKERS ~~AND~~ ^{AND} CALLED THE POLICE AND FALSELY REPORTED A DISTURBANCE WITH PLAINTIFF SAYING TO HAVE STAFF MEMBER REMOVED. APRIL 29 2016 - APRIL 29

ON THE NEXT DAY FRIDAY, THE 43 MANAGER CALLED PLAINTIFF ^{4. WHEREFORE, plaintiff prays that} BUSINESS AND WITHOUT NOTICE OR JUSTIFICATION OR LEGAL AUTHORITY ORDERED PLAINTIFF TO LEAVE THE ~~PLAINTIFFS~~ ^{HER BUSINESS} IMMEDIATELY. PLAINTIFF IS WITHOUT ANY MEANS TO REPRISAL HER PERSONAL EFFECTS, ^{MEANS} ~~AS~~ ^{IN} BUILDING, PLAINTIFF HAS NO OTHER ~~OF~~ ^{OF} SUPERIOR ~~HERSELF~~ ^{OTHER} THAN HER BUSINESS AT THE LET BUILDING IN THE ~~PLAINTIFFS~~ ^{WIFE'S}. PLAINTIFF WAS DENIED DUE PROCESS

PLAINTIFF ^{WIFE'S} WORKING IN A RECIPE HOSTILE, RACIST WORK ENVIRONMENT BY DEFENDANTS.

PLAINTIFF WAS DENIED HER DUE PROCESS TO HAVE REMEDY PRIOR TO ANY ADVERSE, UNWARRANTED ACTION BEING TAKEN. WAS PLACED ON PROBATION ^{Signature of Plaintiff} FOR NO GOOD REASON.

PLAINTIFF HAS BEEN AND CONTINUES TO BE IRREPARABLY HARMED BY DEFENDANTS' ~~CONDUCT~~ ^{CONDUCT}. UNLAWFUL CONDUCT. Over →

PLAINTIFF, WHEELFOLE PRAYS THAT
THIS HONORABLE COURT WILL ORDER
DEFENDANTS TO PERMIT PLAINTIFF TO RETURN TO
AT LET BUILDING IN HARLES IMMEDIATELY
HERE BUSINESS AND PROCEED UNDER

PA 55 Chap 2430 BUSINESS ENTERPRISE
PROGRAM
PLAINTIFF PRAYS
THE COURT WOULD APPOINT PLAINTIFF
AN ATTORNEY & PERMIT THE UNDERLYING DISPUTE ISSUES
ISSUES TO BE HEARD IN ACCORDANCE WITH
THE STATE AND FEDERAL PROCEEDURE & A FAR
HEARINGS. ACCORDY TO FED. & STATE STATUTE
AND PERMIT COUNSEL TO AMEND THIS
COMPLAINT & NOTIFY DEFENDANTS OF
COMPLAINT & HAVE ATTORNEY FEES &
TO HAVE THE US-MARSHAL SERVE COMPLAINT
AND PRAY THE COURT WILL GRANT PLAINTIFF
IFP STATUS

Nyopea Williams 5-2-2016
Nyopea Williams